## UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

| UNITED STATES OF AMERICA, | INDICTMENT CR12-13 RUS/TNL                              |
|---------------------------|---|
| Plaintiff,                | ,<br>) (18 U.S.C. § 1951(a))<br>) (18 U.S.C. § 2113(d)) |
| V.                        |   |
| DONTE MCKINLEY HOLLISTER, |   |
| Defendant.                |   |

THE UNITED STATES GRAND JURY CHARGES THAT:

#### COUNT 1

(Interference with Commerce by Robbery - "Hobbs Act")

On or about September 26, 2011, in the State and District of Minnesota, the defendant,

#### DONTE MCKINLEY HOLLISTER,

did unlawfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect commerce, as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951, in that the defendant did knowingly and unlawfully take and obtain personal property consisting of United States Currency from the presence of an employee of Way to Go Sports store, against his will by means of actual and threatened force, violence, and fear of injury to the employee's person, that is, defendant brandished a firearm and demanded United States Currency from the employee, said currency then being in the custody and control of the Way to Go Sports

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store, a business engaged in interstate commerce, all in violation of Title 18, United States Code, Section 1951(a).

#### COUNT 2

(Interference with Commerce by Robbery - "Hobbs Act")

On or about September 27, 2011, in the State and District of Minnesota, the defendant,

#### DONTE MCKINLEY HOLLISTER,

did unlawfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect commerce, as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951, in that the defendant did knowingly and unlawfully take and obtain personal property consisting of United States Currency from the presence of an employee of Wine Styles store, against his will by means of actual and threatened force, violence, and fear of injury to the employee's person, that is, defendant brandished a firearm and demanded United States Currency from the employee, said currency then being in the custody and control of the Wine Styles store, a business engaged in interstate commerce, all in violation of Title 18, United States Code, Section 1951(a).

### COUNT 3

(Interference with Commerce by Robbery - "Hobbs Act")

On or about October 7, 2011, in the State and District of Minnesota, the defendant,

#### DONTE MCKINLEY HOLLISTER,

did unlawfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect commerce, as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951, in that the defendant did knowingly and unlawfully take and obtain personal property consisting of United States Currency from the presence of an employee of Mattress Giant store, against his will by means of actual and threatened force, violence, and fear of injury to the employee's person, that is, defendant brandished a firearm and demanded United States Currency from the employee, said currency then being in the custody and control of the Mattress Giant store, a business engaged in interstate commerce, all in violation of Title 18, United States Code, Section 1951(a).

#### COUNT 4

(Interference with Commerce by Robbery - "Hobbs Act")

On or about October 13, 2011, in the State and District of Minnesota, the defendant,

## DONTE MCKINLEY HOLLISTER,

did unlawfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect commerce, as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951, in that the defendant did knowingly and unlawfully take and obtain personal property consisting of United States Currency from the presence of an employee of the 2nd Wind Exercise Equipment store, against his will by means of actual and threatened force, violence, and fear of injury to the employee's person, that is, defendant brandished a firearm and demanded United States Currency from the employee, said currency then being in the custody and control of the 2nd Wind Exercise Equipment store, a business engaged in interstate commerce, all in violation of Title 18, United States Code, Section 1951(a).

# COUNT 5 (Armed Bank Robbery)

On or about October 17, 2011, in the State and District of Minnesota, the defendant,

#### DONTE MCKINLEY HOLLISTER,

did knowingly, by force, violence, and intimidation, take from the person and presence of a victim teller approximately \$1,890 in United States currency belonging to and in the care, custody, control, management, and possession of the U.S. Bank located at

2338 Central Avenue in Minneapolis, Minnesota, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and in committing such offense, did assault and put in jeopardy the life of another person by the use of a dangerous weapon, that is, a handgun, in violation of Title 18, United States Code, Section 2113(d).

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| רשידואוז | CTATEC | ATTORNEY | FOREPERSON |
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